

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

v.

ANDREW B. KASNETZ

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No. 3:18-CR-00345-D

MOTION FOR EXTENSION OF DEADLINES

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW DEFENDANT, Mr. Andrew Kasnetz, and files this, his Motion for Extension of Deadlines, and in support shows the following:

1. I respectfully request an additional twenty-one days to retain counsel to make an appearance and extend the pretrial motion deadline.
2. The time provided for the motions combined with the inability to extend any of the pre-motion deadlines have made it all but impossible for a competent attorney to say that they are able to do an adequate job with such tight deadlines. There is currently a deadline for my new counsel to file an appearance by July 26, 2021. I have been unable to retain new counsel as of this date.
3. The potential attorneys I've consulted with, due to their existing case loads, the complexity of the case, and the complexity of the defense, do not believe there is adequate time to hire the appropriate experts to adequately provide me with a proper defense and a fair trial.
4. The April trial date is adequate and manageable, however, the December 3, 2021 motion deadline is not based on my consultations with potential attorneys.

5. For these reasons, I respectfully request a twenty-one day extension to retain new counsel, a sixty day extension of the pretrial motion deadline, and a reconsideration of the prior Court's Order of requiring the Order to be turned over to new counsel.

6. The purpose of this request is not to delay, but to guarantee a fair trial.

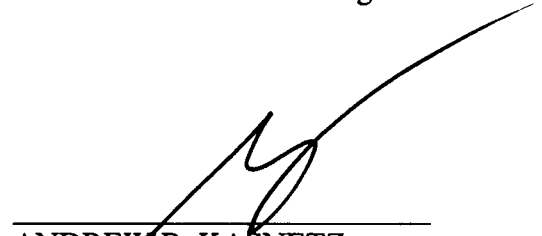
RESPECTFULLY SUBMITTED,



ANDREW B. KASNETZ,
DEFENDANT
P.O. Box 190543
Dallas, TX 75219
214-434-6492

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2021 true and correct copies of this document were served on the assistant United States Attorney of record in this case through the US Postal Service.



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